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Bill Chimos (BC-9381)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
HARTFORD FIRE INSURANCE COMPANY as  
subrogor of Lycee Francais De New York,

07 Civ. 4084 (SHS) (AJP)

Plaintiff,

-against-

MAYRICH CONSTRUCTION CORP., LANGAN  
ENGINEERING & ENVIRONMENTAL SERVICES,  
INC., F.J. SCIAME CONSTRUCTION CO., INC.,  
POLSHEK PARTNERSHIP, LLP & CANTOR  
SEINUK GROUP, INC.,

Defendants.  
----- X

**DEFENDANT POLSHEK PARTNERSHIP LLP'S  
RULE 26(a)(1) INITIAL DISCLOSURES**

Defendant Polshek Partnership LLP ("Polshek") makes the following disclosures pursuant to Rules 26(a)(1) of the Federal Rules of Civil Procedure:

**A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION  
THAT MAY BE USED TO SUPPORT POLSHEK'S CLAIMS AND DEFENSES**

Polshek's Initial Disclosure is made without the benefit of any discovery. Polshek reserves the right to amend its disclosures to add additional witnesses. Polshek also accepts as accurate the identification of witnesses made by other parties to the action.

**B. CATEGORIES AND LOCATION OF DOCUMENTS**

Documents related to the agreement between Polshek and The Lycee Francais de New York. All of the aforesaid documents are located at the office maintained by Polshek at the following address:

320 West 13<sup>th</sup> Street  
New York, New York 10014

**C. COMPUTATION OF DAMAGES**

Polshek claims damages only to the extent that Polshek is held liable to Plaintiff for injuries resulting from negligence on the part of Defendants Mayrich Construction Corp., Langan Engineering & Environmental Services, Inc., F.J. Sciamè Construction Co., Inc., and/or Cantor Seinuk Group, Inc.

**D. INSURANCE**

Polshek maintained Design Professionals Liability Insurance with CNA under Policy Number AEA-113801972 effective from 11/14/05 to 11/14/06. The policy provides a \$5,000,000 per claim limit of liability.

Polshek reserves the right to amend its disclosures pursuant to the requirements of the Federal Rules of Civil Procedure.

Dated: New York, New York  
August 7, 2007

**ZETLIN & DE CHAIRA, LLP**

By: Bill Chimos  
Bill Chimos (BC-9381)

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